

**UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF OHIO
EASTERN DIVISION**

In re: Charles Watkins) Case Number: 17-16515
Debtor.) Chapter 13 Proceedings
) Judge Jessica E. Price Smith

TRUSTEE’S OBJECTION TO DEBTOR’S MOTION TO MODIFY

Now comes **LAUREN A. HELBLING**, the duly appointed and qualified Standing Chapter 13 Trustee (“Trustee”) herein, by and through counsel, and hereby objects to the Debtor’s Motion to Modify filed with this Court on May 1, 2020 (hereinafter “Debtor’s Motion”). In support of her objection, the Trustee makes the following representations to the Court:

1. In order to determine if the Debtor’s Motion complies with Sections 1325 and 1329 of the Bankruptcy Code, the Trustee requests proof of the Debtor’s current household income and expenses.

WHEREFORE your Trustee, being a proper party in interest, hereby moves this Honorable Court to deny the Debtor’s Motion for the reasons cited.

Respectfully submitted,

/s/ Holly Davala

HOLLY DAVALA #0070447

Staff Attorney for Chapter 13 Trustee

Office of the Chapter 13 Trustee, Lauren A. Helbling

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CERTIFICATE OF SERVICE

I certify that on May 8, 2020, a true and correct copy of Trustee's Objection was served:

Via the Court's Electronic Case Filing System on these entities and individuals who are listed on the Court's Electronic Mail Notice List:

Charles Watkins, Attorney, on behalf of Debtor at rhlegal@aol.com

/s/ Holly Davala

HOLLY DAVALA #0070447

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